

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AMERICAN BROADCASTING
COMPANIES, INC., DISNEY
ENTERPRISES, INC., TWENTIETH
CENTURY FOX FILM CORPORATION,
CBS BROADCASTING INC., CBS STUDIOS
INC., FOX TELEVISION STATIONS, LLC,
FOX BROADCASTING COMPANY, LLC,
NBCUNIVERSAL MEDIA, LLC,
UNIVERSAL TELEVISION LLC, and OPEN
4 BUSINESS PRODUCTIONS, LLC,

Plaintiffs,

v.

DAVID R. GOODFRIEND and SPORTS
FANS COALITION NY, INC.,

Defendants.

No. 19-cv-7136 (LLS)

USDC SDNY
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**JOINT STIPULATION AND ~~PROPOSED~~ ORDER
MODIFYING CASE SCHEDULING ORDER**

LLS

Plaintiffs, American Broadcasting Companies, Inc., Disney Enterprises, Inc., Twentieth Century Fox Film Corporation, CBS Broadcasting Inc., CBS Studios Inc., Fox Television Stations, LLC, Fox Broadcasting Company, LLC, NBCUniversal Media, LLC, Universal Television LLC, and Open 4 Business Productions, LLC ("Plaintiffs"), and Defendants, David R. Goodfriend and Sports Fans Coalition NY, Inc. ("Defendants"), by and through their counsel, respectfully submit this Joint Stipulation and Proposed Order Modifying the Scheduling Order in the above-captioned matter.

On January 31, 2020, this Court entered an initial Scheduling Order with deadlines set through the close of expert discovery on September 11, 2020. The Court also scheduled a status

conference for June 19, 2020 to assess the progress of the case and set the remaining case schedule.

The parties request a two-month extension of the deadlines set forth below because of the impact of the disruptions caused by the COVID-19 health crisis, including local government restrictions on out-of-home activities. Counsel for the parties have conferred about the effect of these circumstances upon the case's schedule. The parties request that the Court retain the June 19, 2020 status conference (telephonic or in person, as the Court directs) to assess the case's progress. This is the first time the parties have sought an extension or modification to the case schedule.

IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, that the following deadlines are extended pursuant to the table below:

Event	Current Deadline	New Deadline
Status conference	Friday, June 19	Unchanged
Fact discovery completed	Friday, June 19	Friday, August 14
Burden-of-proof expert reports	Friday, July 17	Friday, September 11
Rebuttal expert reports	Friday, August 14	Friday, October 9
Expert discovery completed	Friday, September 11	Friday, November 6

Dated: May 12, 2020

Respectfully submitted,

/s/ Elizabeth E. Brenckman

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On this 12th day of May, 2020,

Approved By:

Louis L. Stanton
The Honorable Louis L. Stanton
United States District Judge